

Tab 2

(PART THREE)

1 Cornelia what Larry had done to you, that
2 Sunday?

3 A. Any time.

4 Q. The Sunday before?

5 A. Yeah, the Sunday before. Just
6 everything.

7 Q. Everything?

8 A. Yeah; and I couldn't get it out. I was
9 crying too hard.

10 Q. Were you trying to tell her about the
11 hugs?

12 A. Yes.

13 Q. Were you trying to tell her about the
14 kiss?

15 A. Yes.

16 Q. Were you trying to tell her about his
17 hands on the top of your butt?

18 A. Yes.

19 Q. But you couldn't get it out?

20 A. I couldn't get it out.

21 Q. What did you get out?

22 A. Just the words "Larry Meade being
23 mean."

24 Q. "Larry Meade being mean"?

25 A. Yeah, that's all I got out as far as I

1 know.

2 Q. What happened then?

3 A. She just kept telling me to calm down,
4 calm down, calm down; kept hugging me. By then
5 Harold was there.

6 Q. Then what happened?

7 A. They left Harold with me for a while
8 and he settled me down.

9 Q. What did you tell Harold? You and
10 Harold were left alone in Johan's office?

11 A. Yes.

12 Q. What did you and Harold discuss when
13 you were alone in Johan's office?

14 A. What I had done in the morning.

15 Q. Meaning calling Mrs. Meade?

16 A. Yeah.

17 Q. That's all you discussed?

18 A. Yeah.

19 Q. Did Harold ask you why you were at
20 work?

21 A. Yeah.

22 Q. What did you tell him?

23 A. I told him I was coming to beat up
24 Larry Meade.

25 Q. What did Harold say?

1 A. He didn't say anything.

2 Q. How long were you and Harold alone?

3 A. Maybe five, ten minutes.

4 Q. Do you remember anything that Cornelia
5 told you when you and she were alone other than
6 her saying, calm down, calm down?

7 A. I just remember her saying something
8 about, I know what he's like; and she didn't go
9 into detail about it.

10 Q. You specifically remember her saying
11 that?

12 A. Yeah. I know what he's like, that's
13 all she said.

14 Q. After you and Harold spoke you said for
15 about five minutes, what happened then?

16 A. They brought Johan in and -- I think it
17 was Jerry Miller. It was Harold, I, Jerry
18 Miller and Johan.

19 Q. When you say they brought them in, who
20 brought Johan --

21 A. They walked in.

22 Q. Did they knock on the door first?

23 A. Yes.

24 Q. Did they ask if it was okay if they
25 came in?

1 A. Yes.

2 Q. Did they shut the door behind them?

3 A. Yes.

4 Q. Then what happened?

5 A. They just wanted me to tell them why I
6 was there, why I was in the condition I was,
7 what happened.

8 Q. What did you tell them?

9 A. I told them what happened at home, that
10 Larry had come to my home.

11 Q. Okay.

12 A. And what had happened there and that I
13 had called his wife in the morning; and then I
14 just had myself all worked up.

15 Q. Did you tell them anything else?

16 A. No.

17 Q. Did you tell them about the hugging?

18 A. No.

19 Q. Did you tell them about the attempted
20 kiss?

21 A. No.

22 Q. Did you tell them about the hug with
23 the hands on the top of your butt?

24 A. No.

25 Q. Had you told Harold those things at

1 that time?

2 A. No.

3 Q. Did you also tell Johan and Jerry that
4 Harold had called Larry?

5 A. I don't think I did. I think Harold
6 did.

7 Q. How long did this meeting take place?

8 A. 45 minutes maybe.

9 Q. Did you take any notes during that
10 meeting?

11 A. No.

12 Q. Did Harold?

13 A. No.

14 Q. Did you notice whether or not Johan
15 was?

16 A. Yes.

17 Q. And was he taking notes?

18 A. Jerry may have been taking notes and
19 Johan may have been taking notes.

20 Q. Do you know whether or not prior to
21 that date -- and we're talking about March
22 14th. Do you know whether or not Harold had
23 had any discussions with anyone at HR about
24 Larry Meade and you without you being present?

25 A. He may have talked to Johan, but I

1 about everything.

2 Q. You were just thinking about things
3 between March and June --

4 A. Yeah.

5 Q. -- is that right? Nothing new
6 happened, you were just thinking about the
7 things that had happened; correct?

8 A. Yeah; and I just walked into the men's
9 bathroom --

10 Q. Which one?

11 A. The one that was on the second floor
12 near MIS.

13 -- and I just started crying, couldn't
14 quit.

15 Q. What happened then?

16 A. I left everything, just walked away
17 from everything and went downstairs to the
18 maintenance room; and I called Wayne, my boss
19 at that time, and told him I needed to go home;
20 and he said that he didn't want me leaving, he
21 would be down to talk to me, there was
22 something in my voice that he knew wasn't
23 right, don't leave.

24 Q. He said that to you?

25 A. Yeah. So he came down, sat down with

1 me; and I just told him that, I need to go
2 home, I just need to go home. He said, well,
3 I'm not letting you drive like this. You are
4 not driving.

5 Q. What time of day was this?

6 A. It was in the morning. I'm going to
7 say around 10.

8 Q. You hadn't seen Larry that day?

9 A. No.

10 Q. So there was nothing that Larry did
11 that day to trigger this?

12 A. No.

13 Q. Why did you call Wayne and not Harold?

14 A. Because you have to call your
15 supervisor to tell them you're leaving; and
16 that's what my first indication was, I need to
17 call him and tell him I'm leaving.

18 Q. What happened next?

19 A. He told me that he would take me home
20 and that when he got back he would tell Harold
21 that he took me home, that I wasn't able to
22 drive, because he works in the same building
23 that Harold does.

24 Q. Was that okay with you?

25 A. Yes.

1 Q. That plan was okay with you?

2 A. Yes.

3 Q. What happened then?

4 A. On the way to my house, I just started
5 telling Wayne everything that happened.

6 Q. What do you mean "everything"?

7 A. Larry hugging me and walking in the
8 restrooms and that he had tried to kiss me and
9 he was at my house.

10 Q. Is that the first time that you had
11 told Wayne anything about Larry Meade? Yes?

12 A. Yes.

13 Q. What happened then?

14 A. Harold came home and I told him
15 everything.

16 Q. Is this first time -- did you tell
17 Harold about the attempted kiss? Did you tell
18 Harold about the hug with Larry's hands on the
19 top of your butt?

20 MR. LINDSAY: You're nodding.
21 You have to say yes.

22 A. Yes.

23 Q. Did you tell Harold about the mutual
24 hugs?

25 A. Yes.

1 Q. Did you tell Harold that you would
2 sometimes ask Larry for a hug?

3 A. Yes.

4 Q. What else did you tell Harold?

5 A. I told him about him asking me to go
6 see the oil painting of his son at his house.
7 I told him about him wanting me to go to his
8 son's cemetery to see the headstone. I don't
9 remember everything I told him. I just kept
10 blabbing.

11 Q. How did Harold react?

12 A. He was mad.

13 Q. Was he mad at you?

14 A. Yeah.

15 Q. Why was he mad at you?

16 A. Because I didn't tell him sooner.

17 Q. In that conversation, did Harold accuse
18 you of having a sexual relationship with Larry
19 Meade?

20 A. Yeah.

21 Q. Did you deny it?

22 A. Yes.

23 Q. Did he believe you?

24 A. Yes.

25 Q. Was he still mad?

1 A. Yeah.

2 Q. What happened then?

3 A. He went downstairs and out to the
4 garage, kept to himself. I went downstairs and
5 got something to drink; and I decided to call
6 Susan Stewart.

7 Q. At any time in your conversation with
8 Harold that day, did he tell you he was
9 thinking of leaving you?

10 A. Yeah.

11 Q. Did he tell you that before he accused
12 you of having had a sexual relationship with
13 Larry?

14 A. No.

15 Q. He said it afterwards?

16 A. Yeah.

17 Q. Did he say he was going to leave you
18 even after you told him you had not had a
19 sexual relationship with Larry Meade?

20 A. Yeah.

21 Q. So you called Susan Stewart?

22 A. Yeah.

23 Q. What happened then?

24 A. She told me that I needed to come down
25 and see her.

1 Q. Did you go?

2 A. Yeah.

3 Q. Were you able to go that day?

4 A. Yes.

5 Q. Did Harold take you?

6 A. Yes.

7 Q. Did Harold attend the meeting with
8 Susan with you?

9 A. Yes.

10 Q. Were both of you with Susan together
11 the entire time?

12 A. Not the entire time.

13 Q. Did you spend some time alone with
14 Susan?

15 A. Yes.

16 Q. Did Harold spend some time alone with
17 Susan?

18 A. No.

19 Q. What happened in that meeting?

20 A. She just asked me to tell her
21 everything.

22 Q. Was Harold there?

23 A. Yes.

24 Q. Did you go through it all again?

25 A. Yes.

1 Q. With Harold there?

2 A. Yes.

3 Q. Was there anything new that you told
4 Susan that you hadn't previously told Harold?

5 A. No.

6 Q. What happened then?

7 A. She asked Harold to leave because she
8 felt it was best, that maybe I would open up
9 more if he wasn't in there. So he left and she
10 just asked me did I have sex with him. No. So
11 then she asked Harold to come back in and she
12 told Harold that everything was okay, that I
13 was telling the truth.

14 Q. What happened then?

15 A. She felt that the state that I was in
16 that I shouldn't go home.

17 Q. Why?

18 A. Because I still felt Harold was going
19 to leave me.

20 Q. Why did you still feel that Harold was
21 going to leave you?

22 A. I just did.

23 Q. What happened then?

24 A. He took me over to the hospital in Oil
25 City and admitted me.

1 Q. Is that all you heard from that
2 telephone conversation?

3 A. Yeah.

4 Q. Did you hear Harold say anything to the
5 person on the other line that he felt you
6 hadn't told them the whole story?

7 A. No.

8 Q. Did you hear Harold say, she enticed
9 him?

10 A. No.

11 Q. You came back to work then in June of
12 2003; correct? Did you have any contact with
13 Larry Meade in June of 2003?

14 A. Do you mean physical contact or just --
15 explain a little more.

16 Q. Let's start there. Did you have any
17 physical contact with Larry Meade in June of
18 2003?

19 A. No.

20 Q. Did you see him in June of 2003?

21 A. Yes.

22 Q. Did he speak to you?

23 A. No.

24 Q. In July of 2003, were you working?

25 A. Yes.

1 Q. Did you have any physical contact with
2 Larry in July of 2003?

3 A. No.

4 Q. Did you see Larry in July of 2003?

5 A. Yes.

6 Q. Did you and Larry speak to each other
7 in July of 2003?

8 A. No.

9 Q. Did he speak to you in July of 2003?

10 A. No.

11 Q. Did you file a grievance?

12 A. Yes.

13 Q. Let me back up a little bit, if I can.

14 In July of 2003, did you request that
15 your work area be moved to Plant 1?

16 A. Yes.

17 MS. COCHENOUR: I ask that the
18 court reporter mark this document as Exhibit 4.

19 (Deposition Exhibit No. 4 was
20 marked for identification.)

21 Q. Did you prepare this document?

22 A. Yes.

23 Q. Did you type it at home?

24 A. Yes.

25 Q. Did you bring it to work on July 1st,

1 appropriate job in assisting in the
2 presentation of your grievance?

3 A. Yes.

4 Q. Was one of the things that you wanted
5 to happen as a result of your grievance that
6 Larry Meade be fired?

7 A. Yes.

8 Q. Today is that still your wish, that
9 Larry Meade be fired?

10 A. Yes.

11 Q. Since the time that your grievance was
12 filed and today, have you had any problems with
13 Larry Meade?

14 A. No.

15 Q. Let's kind of reposition these exhibits
16 so we can get back to the journal.

17 Would you turn two more pages, the one
18 that starts "August 1st."

19 MR. LINDSAY: They're out of
20 order. Go ahead.

21 A. I don't have August 1st. Oh, here it
22 is.

23 Q. This is where we have to start looking
24 out for pages that are two-sided copies; okay,
25 Valerie?

1 what's "everything"?

2 A. Probably the calendar, the tablet, any
3 little scribble notes that I had.

4 Q. Do you have all of those scribbled
5 notes that you were using to prepare this
6 document?

7 A. No, because when I wrote it down I
8 threw them away.

9 Q. You threw them away?

10 A. Yeah.

11 Q. Did anybody from HR follow up with you
12 from time to time to make sure you were doing
13 okay?

14 A. Diane Kemick would.

15 Q. Would you turn to the page that has an
16 entry beginning -- or noting October 9th, 2003?

17 A. Okay.

18 Q. Five lines down there's a sentence,
19 "Mr. A wasn't there."

20 Did I read that correctly?

21 A. Yeah.

22 Q. Who is Mr. A?

23 A. Al.

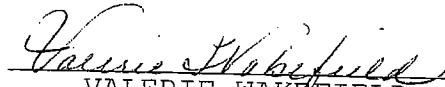
24 Q. Oh, your lawyer, Mr. Lindsay?

25 A. Yes.

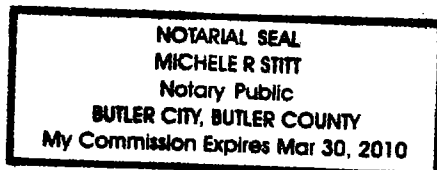
CLL - September 14, 2006

No changes.

In re: WAKEFIELD VS. JOY MINING MACHINERY CO.


VALERIE WAKEFIELD

Sworn to and subscribed before me this
30th day of November, 2006.




NOTARY PUBLIC

My commission expires: _____

NO CORRECTIONS PLEASED